

Law Office of Evan L. Lipton, P.C.
260 Madison Ave, Floor 22
New York, New York 10016
ell@evanliptonlaw.com
(917) 924-9800

By ECF

Hon. Richard Berman
United States District Court Judge
Daniel Moynihan United States Courthouse
500 Pearl Street
New York, New York 10017

MEMO ENDORSED

Re: *United States v. Curtis Scott, 09 Cr. 983 (RMB-4) (VOSR)*

Dear Judge Berman:

I represent Kurt Scott who is currently under the supervision of the Court pursuant to a term of supervised release set to terminate in August 2025. I write, with the consent of United States Probation Officer Michael P. Nicholson, to request that Mr. Scott be permitted to travel to St. Maarten from January 23 to 27 for a celebration of his aunt's fiftieth birthday. If approved, he will provide his precise itinerary to Probation prior to the proposed travel.

Government counsel (A.U.S.A. Michael Maimim) informed me that he objects to Mr. Scott travelling outside of the country. There is no basis for this objection. Mr. Scott is scheduled to complete supervision in August 2025. As the Court undoubtedly recalls, Mr. Scott was released from nearly two years' pre-hearing incarceration on December 20, 2023, after the government was unable to prove the alleged violation of supervised release. In seven evidentiary hearings held since, he has demonstrated that he is behaving responsibly, attending counseling, searching for employment, re-connecting with his daughter and planning for a positive future. The proposed travel – a family trip to celebrate a fiftieth birthday – is another positive development indicative of Mr. Scott's strong bond with his family and should be encouraged.

Thank you for your consideration.

Respectfully,



Evan L. Lipton
Attorney for Kurt Scott

*Let's not tempt fate,
as things are going well.
There will be time enough
to travel internationally at
the conclusion of supervision.
The application is respectfully
denied.*

SO ORDERED:

Date: 1/14/25


Richard M. Berman, U.S.D.J.

USDC CRIM	DOCUMENT
ELECTRONICALLY FILED	
DOC #:	
DATE FILED: <u>1/14/25</u>	